



the contract terms, GEO needs ICE's explicit approval before it can release any language from that contract. Despite GEO's best efforts, the process of coordinating the necessary redactions and obtaining ICE's approval is not yet complete. Accordingly, GEO respectfully requests an extension of one day (until April 22, 2025) to provide the Court with a copy of the ICE Contract.

Redaction and coordination with ICE is necessary because confidential and proprietary trade secret information, as well as the security requirements and standards applicable to the Facility, require the use of systems designed to, among other things: (i) control the introduction of contraband into the Facility, (ii) control all designated points of access and egress on the site including detainee housing units, pods, barracks, courtrooms, and medical facilities, (iii) ensure facility safety, security and good order, and prevent detainee escapes, and (iv) detect and detain persons attempting to gain unauthorized access to the facility.

The security systems used to meet these requirements include, but are not limited to, staffing plans, video monitoring systems, audio monitoring systems, mail screening devices, walk-through screening devices, and a complex system of access control that includes specialized locking mechanisms and monitoring.

GEO has an interest in ensuring that the specifications and details of the various security systems employed at the Facility are kept out of the public domain. Uncertainty by detainees and the general public regarding the Facility's operational

and security systems provide management and staff employees with a critical and necessary advantage. Potential offenders in carceral settings often exploit information regarding the operation of a facility and the nature, location, and operation of various security systems to (i) commit acts of violence, (ii) attempt escape, or (iii) introduce and traffic contraband.

Additionally, the contract contains proprietary and trade secret financial figures, including various costs, financial figures, and staffing plans.

For the foregoing reasons, GEO respectfully requests an extension of one day (until April 22, 2025) to provide the Court with a redacted copy of the ICE Contract.